

UNITED STATES OF DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

KANE MARCEAUX, GREG CORMIER,
SCOTT POIENCOT, NORBERT MYERS,
GABE THOMPSON, NOVEY STELLY,
ULETOM P. HEWITT, REGINA BRISCOE
AND ALEETA M. HARDING

CIVIL ACTION NO: 6:12-cv-01532

VERSUS

JUDGE RICHARD T. HAIK, SR.

LAFAYETTE CITY-PARISH CONSOLIDATED
GOVERNMENT; LAFAYETTE POLICE
DEPARTMENT THROUGH THE LAFAYETTE
CITY-PARISH CONSOLIDATED
GOVERNMENT; LESTER JOSEPH "JOEY"
DUREL, JR. IN HIS CAPACITY AS PRESIDENT
OF THE LAFAYETTE CITY-PARISH
CONSOLIDATED GOVERNMENT; DEE
EDWARD STANLEY, INDIVIDUALLY AND IN
HIS CAPACITY AS CHIEF ADMINISTRATIVE
OFFICER OF THE LAFAYETTE CITY-PARISH
CONSOLIDATED GOVERNMENT; JAMES P.
"JIM" CRAFT, INDIVIDUALLY AND IN HIS
CAPACITY AS CHIEF OF THE LAFAYETTE
POLICE DEPARTMENT; AND GEORGE
"JACKIE" ALFRED, INDIVIDUALLY AND IN
HIS CAPACITY AS PATROL DIVISION
COMMANDER OF THE LAFAYETTE
POLICE DEPARTMENT

MAGISTRATE JUDGE PATRICK J. HANNA

MOTION TO EXTEND DEADLINES

NOW INTO COURT, through undersigned counsel, come Defendants, LAFAYETTE CITY-PARISH CONSOLIDATED GOVERNMENT ("LCG"), DEE EDWARD STANLEY, INDIVIDUALLY, JAMES P. "JIM" CRAFT, INDIVIDUALLY, AND GEORGE "JACKIE" ALFRED, INDIVIDUALLY, who move for extension of the deadlines to complete discovery and to file anticipated Motions for Summary Judgments, which undersigned counsel estimate are currently set for April 8, 2014, upon representing to the Court as follows:

1.

This matter was originally set for trial on December 9, 2013, with attendant Scheduling Order issued by the Court.

2.

Following numerous pre-trial proceedings with which the Court is familiar, the case was re-scheduled for trial to commence on August 4, 2014.

3.

According to telephone conferences with the Honorable Judge Haik's minute clerk, the Clerk would not issue a second Scheduling Order for the August 4, 2014 trial date. Rather, undersigned counsel were to estimate the proposed deadlines based on this Court's original Scheduling Order for the December 9, 2013 trial date.

4.

Based on undersigned counsel's best estimate, the deadline for filing dispositive motions and for completing Phase I discovery would be April 8, 2014.

5.

Because some Plaintiffs have been uncooperative in scheduling and appearing for their depositions and dilatory in providing all discovery responses, Defendants will not have sufficient time to prepare anticipated Motions for Summary Judgment. In addition, Defendants anticipate filing six (6) separate Motions for each remaining Plaintiff, because each Plaintiff's claims are unique and generally unrelated to the others, such that each Motion will require substantial time to draft.

6.

Defendants seek to re-set and/or establish new deadlines for completion of Phase I discovery and filing their Motions for Summary Judgment. Assuming Plaintiffs cooperate moving forward, Defendants reasonably anticipate being able to file their Motions for Summary Judgment on or before May 30, 2014.

7.

Plaintiff has no objection to the request in this motion.

RESPECTFULLY SUBMITTED:

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INDIVIDUALLY, JAMES P. “JIM” CRAFT,
INDIVIDUALLY, AND GEORGE “JACKIE”
ALFRED, INDIVIDUALLY

CERTIFICATE

This is to certify that on April 2, 2014, I presented the foregoing to the Clerk of the Court for filing and uploading to the CM/ECF system which will send notification of such filing to the following:

springlaw@gmail.com

jca@jcalaw.us

ralexander@deep-south.com

hanna_orders@lawd.uscourts.gov

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participant or pro se defendant:

None.

s/Michael P. Corry

MICHAEL P. CORRY- 20764